



25 Cannon Street
London EC4M 5UB
UK
+44 20 7184 7000 Main
+44 20 7184 7001 Fax
www.dechert.com

June 6, 2025

BY ECF

The Honorable Angel Kelley
United States District Court
District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

ROGER BURLINGAME
Partner

Roger.Burlingame@dechert.com
+44 20 7184 7333 Direct
+44 20 7184 7001 Fax

Re: *United States v. Aleksei Andriunin*, 1:24-cr-10190-AK

Dear Judge Kelley,

I am writing to respectfully request permission to file a 48-page sentencing memorandum on behalf of Mr. Andriunin in the above-referenced case ahead of the sentencing hearing scheduled for June 12, 2025. The government consents to the request.

I sincerely apologize that this motion was not filed earlier. I was aware of the normal 20-page limit for memoranda in support of motions and originally anticipated making this motion for excess pages earlier this week, speaking about it with your Courtroom Deputy, Mr. Lara. I then, however, spoke with two experienced criminal lawyers who regularly practice in Boston federal court and came to understand that the 20-page limit did not apply to sentencing submissions. I did not want to burden the court with an unnecessary filing, and mistakenly assumed that Mr. Lara had been telling me that if a filing for excess pages were necessary, then I should make it, rather than his instructing me that it was, indeed, necessary. I very much regret my error and again sincerely apologize for it.

The need for an oversized sentencing submission here arises from the complexity and breadth of the issues involved in Mr. Andriunin's case, which bear directly upon the question of the appropriate sentence. Mr. Andriunin has a remarkable story, as evidenced by the 41 letters of support we have received (the most salient parts of which we have highlighted in our submission). The additional pages in our brief will ensure that we can present the arguments on his behalf with the thoroughness they deserve and thereby assist the Court in determining a just sentence.

We also worked with the Government to file a joint sentencing submission as to Gotbit, which



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was concise, obviated the need for a separate defense submission for Gotbit, and hopefully saved judicial resources.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "R. Burlingame", followed by a long horizontal line.

Roger Burlingame